	TATES DISTRICT COURT	FILED
	N DISTRICT OF INDIANA ANAPOLIS DIVISION	FEB 1 7 2021
UNITED STATES OF AMERICA,)	U.S. CLERK'S OFFICE INDIANAPOLIS, INDIANA
Plaintiff,)	
V.) CAUSE NO.	
LATASHA DAVIS, Defendant.	1:21-cr-0	051 JRS -DLP
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The Grand Jury charges that:

COUNT 1
18 U.S.C. § 922(a)(6)
Making a False Statement during Purchase of a Firearm

INDICTMENT

On or about March 16, 2020, in Marion County, Indiana, within the Southern District of Indiana, LATASHA DAVIS, the defendant herein, in connection with the acquisition of a firearm, to wit: a Glock .40 caliber pistol bearing serial number BKSF669, from Indy Gun Bunker LLC, a licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to Indy Gun Bunker LLC, which statement was intended and likely to deceive Indy Gun Bunker LLC, as to a material fact to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did falsely declare on an ATF Form 4473, Firearms Transaction Record, that she was the actual transferee/buyer of the firearm.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 2 18 U.S.C. § 924(a)(1)(A)

Making a False Statement with Respect to Information Required to be kept by Licensed Firearms

Dealers

On or about March 16, 2020, in Marion County, Indiana, within the Southern District of Indiana, the defendant, LATASHA DAVIS, the defendant herein, did knowingly make a false statement and representation to Indy Gun Bunker, a licensed firearms dealer under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Indy Gun Bunker, in that the defendant did falsely declare on an ATF Form 4473, Firearms Transaction Record, that she was the actual transferee/buyer of a Glock .40 caliber pistol bearing serial number BKSF669.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE ALLEGATION

- 1. The allegations contained in this indictment are realleged as if fully set forth herein, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924 and Title 28, United States Code, Section 2461(c).
- 2. If convicted of an offense set forth in this Indictment, Defendant herein shall forfeit to the United States any firearm or ammunition involved in or used in such offense.

A TRUE BILL

FOREPERSON

JOHN E. CHILDRESS

Acting United States Attorney

Lawrence D. Hilton

Assistant United States Attorney